

COOLEY LLP
STEPHEN C. NEAL (170085) (nealsc@cooley.com)
PATRICK E. GIBBS (183174) (pgibbs@cooley.com)
3175 Hanover Street
Palo Alto, California 94304-1130
Telephone: +1 650 843 5000
Facsimile: +1 650 849 7400
Attorneys for Defendants
TESLA, INC., ELON MUSK, BRAD W. BUSS,
ROBYN DENHOLM, IRA EHRENPREIS,
ANTONIO J. GRACIAS, JAMES MURDOCH,
KIMBAL MUSK, and LINDA JOHNSON RICE

LEVI & KORSINSKY, LLP
ADAM M. APTON (SBN 316506)
ADAM C. MCCALL (SBN 302130)
388 Market Street, Suite 1300
San Francisco, CA 94111
Telephone: (415) 373-1671
Facsimile: (212) 363-7171

Attorneys for Lead Plaintiff
GLEN LITTLETON and the Class

[Additional counsel listed on signature page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE TESLA, INC. SECURITIES
LITIGATION

Case No. 3:18-cv-04865-EMC

**STIPULATED REQUEST FOR ORDER
CHANGING TIME AND ORDER AS
MODIFIED**

Pursuant to Civil Local Rule 6-2, Lead Plaintiff Glen Littleton (“Lead Plaintiff”) and Defendants Tesla, Inc., Elon R. Musk, Brad W. Buss, Robyn Denholm, Ira Ehrenpreis, Antonio J. Gracias, James Murdoch, Kimbal Musk, and Linda Johnson Rice (collectively, “Defendants”) (collectively, Lead Plaintiff and Defendants are referred to as the “Parties”), by and through their

1 undersigned counsel of record, submit the following stipulation and proposed order:

2 WHEREAS, on May 22, 2020, the Parties filed a Joint Case Management Statement and
3 Proposed Order proposing litigation deadlines for this case (Dkt. No. 256);

4 WHEREAS, on May 31, 2020, the Court entered a Case Management and Pretrial Order for
5 Jury Trial setting the litigation deadlines for this case (Dkt. No. 261);

6 WHEREAS, because substantial discovery still remains to be completed, counsel for
7 Defendants and counsel for Lead Plaintiff have conferred regarding extending certain litigation
8 deadlines for this case;

9 WHEREAS, the Parties agreed to modify certain deadlines for this case while maintaining the
10 previously scheduled dates for the Final Pretrial Conference and Trial;

11 NOW, THEREFORE, the Parties hereby jointly request that the Court enter an order
12 establishing the following deadlines in this case:

Event	Current Schedule	Proposed Modified Schedule
Non-Expert Discovery Cut-Off	June 15, 2021	September 28, 2021
Opening Expert Reports	July 14, 2021	October 12, 2021
Rebuttal Expert Reports	August 25, 2021	November 16, 2021
Expert Discovery Cut-Off	September 15, 2021	December 3, 2021
Dispositive Motions	October 15, 2021	December 9, 2021
Opposition to Dispositive Motions	November 23, 2021	January 10, 2022
Reply in Further Support of Dispositive Motions	December 23, 2021	January 31, 2022
Hearing on Dispositive Motions	January 20, 2022	February 17, 2022
Final Pretrial Conference	May 3, 2022	May 3, 2022
Trial	May 31, 2022	May 31, 2022

1 Dated: May 3, 2021

2 COOLEY LLP

3 By: /s/ Patrick E. Gibbs
4 Patrick E. Gibbs

5 Stephen C. Neal (170085)
6 Patrick E. Gibbs (183174)
7 Samantha A. Kirby (307917)
8 3175 Hanover Street
9 Palo Alto, CA 94304-1130
Telephone: (650) 843-5000
Facsimile: (650) 849-7400
Email: nealsc@cooley.com
pgibbs@cooley.com
skirby@cooley.com

10 Sarah M. Lightdale (pro hac vice)
11 Brian M. French (pro hac vice)
12 Bingxin Wu (pro hac vice)
13 55 Hudson Yards
14 New York, NY 10001-2157
Telephone: (212) 479-6000
Facsimile: (212) 479-6275
Email: slightdale@cooley.com
bfrance@cooley.com
bwu@cooley.com

15 Attorneys for Defendants Tesla, Inc., Elon Musk,
16 Brad W. Buss, Robyn Denholm, Ira Ehrenpreis,
17 Antonio J. Gracias, James Murdoch, Kimbal
18 Musk, and Linda Johnson Rice

19

20

21

22

23

24

25

26

27

28

1 Dated: May 3, 2021

LEVI & KORSINSKY, LLP

2 By: /s/ Adam M. Apton
3 Adam M. Apton

4 Adam M. Apton (316506)
5 Adam C. McCall (302130)
6 388 Market Street, Suite 1300
7 San Francisco, CA 94111
8 Telephone: (415) 373-1671
9 Facsimile: (212) 363-7171
10 Email: aapton@zlk.com
11 Email: amccall@zlk.com

12 Nicholas I. Porritt (admitted pro hac vice)
13 Alexander A. Krot III (admitted pro hac vice)
14 1101 30th Street NW, Suite 115
15 Washington, D.C. 20007
16 Telephone: (202) 524-4290
17 Facsimile: (212) 363-7171
18 Email: nporritt@zlk.com
19 Email: akrot@zlk.com

20 Joseph Levi (admitted pro hac vice)
21 Eduard Korsinsky (admitted pro hac vice)
22 55 Broadway, 10th Floor
23 New York, New York 10006
24 Tel: (212) 363-7500
25 Fax: (212) 363-7171
26 Email: jlevi@zlk.com
27 Email: ek@zlk.com

28 Attorneys for Lead Plaintiff
1 GLEN LITTLETON and the Class

20 IT IS SO ORDERED.

21 Date: May 5, 2021



22
23 The Honorable Edward M. Chen
24
25 UNITED STATES DISTRICT JUDGE
26
27
28